IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

JAYLA ALLEN, DAMON JOHNSON, RAUL SANCHEZ, and TREASURE SMITH,

Plaintiffs,

v.

WALLER COUNTY, TEXAS; THE WALLER COUNTY COMMISSIONERS COURT; JUDGE CARBETT "TREY" J. DUHON III, in his official capacity as the Waller County Judge; CHRISTY A. EASON, in her official capacity as the Waller County Elections Administrator,

Defendants.

Civil Case No. 4:18-cy-3985

PLAINTIFFS' UNOPPOSED MOTION TO PARTICIPATE BY TELEPHONE FOR THE INITIAL PRETRIAL AND SCHEDULING CONFERENCE

Pursuant to Magistrate Judge Frances H. Stacy's Procedures Manual ("M.P.") 3(b), Plaintiffs Jayla Allen, Damon Johnson, Raul Sanchez, and Treasure Smith (collectively, "Plaintiffs"), through their undersigned Counsel, hereby move the Court to grant their *Unopposed Motion to Participate by Telephone for the Initial Pretrial and Scheduling Conference* scheduled for March 7, 2019 at 10:00 a.m. CST. Although a member of Plaintiffs' counsel team, Nicole Lynn, will appear in person for the court-ordered conference, Plaintiffs' lead counsel from the NAACP Legal Defense and Educational Fund, Inc. ("LDF"), who are based in New York, request leave to participate telephonically. If permitted, Plaintiffs' counsel are able to provide a dial-in telephone conference number, unless the Court prefers that they call in to a number provided by the Court. Counsel for Defendants have advised that they do not oppose this motion.

Plaintiffs respectfully request that the Court grant the telephone conference request pursuant to M.P. 3(b).

Respectfully submitted on March 5, 2019,

Of Counsel:

/s/ Leah C. Aden

Leah C. Aden*
Deuel Ross*

Kristen A. Johnson*

John S. Cusick*

NAACP LEGAL DEFENSE AND EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor New York, NY 10006

Phone: (212) 965-2200 Fax: (212) 226-7592

laden@naacpldf.org

dross@naacpldf.org kjohnson@naacpldf.org

icusick@naacpldf.org

Catherine Meza*

NAACP LEGAL DEFENSE AND EDUCATIONAL FUND, INC.

700 14th Street NW, Suite 600

Washington, DC 20005 Phone: (202) 682-1300 Fax: (212) 226-7592 cmeza@naacpldf.org

*Pro Hac Vice

Adam T. Schramek (SDTX 31913)

State Bar No. 24033045 Attorney-in-Charge

NORTON ROSE FULBRIGHT US LLP

98 San Jacinto Boulevard, Suite 1100

Austin, Texas 78701-4255 Telephone: (512) 474-5201 Facsimile: (512) 536-4598

adam.schramek@nortonrosefulbright.com

Julie Goodrich Harrison (SDTX 3017799)

State Bar No. 24092434 Nicole Lynn (SDTX 3041738) State Bar No. 24095526

NORTON ROSE FULBRIGHT US LLP

1301 McKinney Street, Suite 5100

Houston, Texas 77010 Telephone: (713) 651-5151 Facsimile: (713) 651-5246

julie.harrison@nortonrosefulbright.com nicole.lynn@nortonrosefulbright.com

William F. Calve (SDTX 3206298)

State Bar No. 24096505

NORTON ROSE FULBRIGHT US LLP

300 Convent Street, Suite 2100 San Antonio, Texas 78205-3792 Telephone: (210) 270-7132

Facsimile: (210) 270-7205

william.calve@nortonrosefulbright.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing *Plaintiffs' Unopposed Motion to*Participate By Telephone for the Initial Pretrial and Scheduling Conference with the Court using the CM/ECF system, which provides notice of filing to all counsel of record.

/s/ Leah C. Aden Leah C. Aden

Attorney for Plaintiffs